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May 22, 2020

BY ECF

The Honorable Katharine H. Parker
United States Magistrate Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Bah v. The City of New York, et al.,
20-CV-263 (AT)(KHP)

Your Honor:

I am an attorney in the office of James E. Johnson, Corporation Counsel of the City of New York, representing the defendant City of New York in the above-referenced matter. Pursuant to Your Honor's order (see Order dated May 6, 2020, ECF No. 17), defendant writes on behalf of both parties to provide the Court with a status report and to request a sixty (60) day enlargement of all current deadlines.

By way of background, during a telephone status conference held on April 23, 2020 before Your Honor, defendant agreed to identify the John and Jane Doe officers to allow plaintiff to file an amended complaint before commencing motion practice on defendant's intended motion to dismiss. Your Honor then issued a scheduling order containing the following deadlines: Amended pleadings due by 5/29/2020; Motion to Dismiss due by 6/30/2020; Responses due by 7/30/2020; and Reply due by 8/14/2020. (See Scheduling Order dated April 23, 2020, ECF No. 14.)

Due to the significant disruption in normal business functions caused by the COVID-19 pandemic and since plaintiff is seeking to name multiple officers assigned to different commands (i.e., the precinct of arrest, the Mass Arrest Processing Center ("MAPC"), and the New York County Court Section), defendant has not yet been able to identify all of the John and Jane Doe officers. As such, additional time is needed for defendant to investigate and determine the identities of these officers. The parties therefore propose the following revised schedule:

Plaintiff's Amended Pleading to be filed:	July 28, 2020
Defendant's Motion to Dismiss to be filed:	August 31, 2020
Plaintiff's Opposition to be filed:	September 28, 2020
Defendant's Reply to be filed:	October 13, 2020

Thank you for your consideration of this request.

Sincerely yours,

Bilal Haider /s

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